

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
SOUTHERN DISTRICT**

DESHAUN RAMBUS,)	
)	Case No.
Plaintiff,)	
)	Judge
v.)	
)	Magistrate Judge
OFFICER OBERTINI,)	
)	Jury Demand
Defendant.)	

COMPLAINT AT LAW

NOW COMES the Plaintiff, DESHAUN RAMBUS, by and through his attorneys, Gregory E. Kulis & Associates, Ltd. and in his Complaint against the Defendant, OFFICER OBERTINI, individually, states as follows:

COUNT I— EXCESSIVE FORCE

1. This action is brought pursuant to the law of the U.S. Constitution, specifically 42 U.S.C. § 1983. That jurisdiction is proper with this court pursuant to 28 U.S.C. 1331 and 1343 as this matter involves issues of federal law.

2. That the Plaintiff, DESHAUN RAMBUS, is a resident of the State of Illinois.

3. That on or about May 9, 2016, the Plaintiff was in custody of the Illinois Department of Corrections and housed in Pinckneyville Correctional Center.

4. The Plaintiff was at Boot Camp at the Pinckneyville Correctional Center in Perry County, Illinois.

5. At all relevant times, the Defendant, OFFICER OBERTINI was an Illinois Department of Corrections officers working at the Pinckneyville Correctional Center Boot Camp.

6. That at all times relevant, Defendant, OFFICER OBERTINI, was acting as an employee/agent of the Illinois Department of Corrections.

7. On or about May 9, 2016, the Plaintiff, DESHAUN RAMBUS, was on his knees at Boot Camp.

8. The Plaintiff was not a threat to the Defendant or anyone else.

9. Defendant OFFICER OBERTINI arrived.

10. Thereafter, the Defendant, OFFICER OBERTINI, physically attacked the Plaintiff, striking him in the side.

11. The Plaintiff, DESHAUN RAMBUS, was injured and suffered from those injuries.

12. The Plaintiff did nothing to provoke said use of force.

13. The aforesaid use of force by Defendant OFFICER OBERTINI was excessive, unprovoked and unreasonable.

14. The Plaintiff complained and an investigation was completed.

15. The actions and inactions of the Defendant were intentional, willful and wanton.

16. Said actions violated the Plaintiff's Eighth Amendment rights and were in violation of said rights as protected in 42 U.S.C. §1983.

17. That as a direct and proximate result of the actions of the Defendant, the Plaintiff suffered and continues to suffer fear, emotional distress, anxiety, pain and suffering, and monetary expense.

WHEREFORE, the Plaintiff, DESHAUN RAMBUS, prays that this Honorable Court enter judgment against the Defendant, OFFICER OBERTINI, jointly and severally, in an amount of reasonable in compensatory damages and for punitive damages, plus attorney's fees and costs.

JURY DEMAND

Plaintiff DESHAUN RAMBUS prays for trial by jury.

Respectfully submitted,

/s/ Gregory E. Kulis_____

Gregory E. Kulis and Associates, Ltd.
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